

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

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This document relates to:

Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-9849 (GBD)(SN)
(S.D.N.Y.)

Burnett, et al. v. Islamic Republic of Iran, et al., Case No. 15-cv-9903 (GBD)(SN)
(S.D.N.Y.)

**SUGGESTION OF DEATH AND MOTION TO SUBSTITUTE PARTIES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

AND NOW, this 29th day of June, 2021, it is suggested of record that the Plaintiff Marjorie Ann Farley, of 195 W. Commons Drive, St. Simons Island, Georgia 31522, died on June 5, 2018, in the state of Georgia.

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the following parties for Marjorie Ann Farley, Deceased. Ms. Farley was pursuing claims both individually as the mother of Paige Farley Hackel, Deceased, and as the Personal Representative of the Estate of Paige Farley Hackel, Deceased. Lisa Ann Cenicola has been appointed the Personal Representative of the Estate of Marjorie Ann Farley, and she has also been appointed the Personal Representative of the Estate of Paige Farley Hackel.

The following chart demonstrates the manner in which Ms. Cenicola should be substituted into the Complaints:

| Identification of Party to be Substituted (Plaintiff's name and relationship to Decedent) | State of Residency at Filing | Reference to Plaintiff in ECF No. 53 (15-cv-9903) and ECF No. 432-2 (02-cv-1616 (D.D.C.)) | Decedent's Name | Paragraph of Complaint Discussing Decedent |
|--|------------------------------|---|----------------------|--|
| LISA ANN CENICOLA, as Personal Representative of the Estate of Marjorie Ann Farley, Deceased | GA | MARJORIE FARLEY, as Personal Representative of the Estate of Paige Farley Hackel, Deceased and on behalf of all beneficiaries of Paige Farley Hackel / MARJORIE FARLEY (P4858) [in multiple capacities: individually and as Personal Representative of the Estate of Paige Farley Hackel, Deceased] | Hackel, Paige Farley | ECF No. 53 (15-cv-9903) at ¶3017; ECF No 432-2 (02-cv-1616 (D.D.C.)) |
| LISA ANN CENICOLA, as Personal Representative of the Estate of Paige Farley Hackel, Deceased | MA | MARJORIE FARLEY, as Personal Representative of the Estate of Paige Farley Hackel, Deceased and on behalf of all beneficiaries of Paige Farley Hackel / MARJORIE FARLEY (P4858) [in multiple capacities: individually and as Personal Representative of the Estate of Paige Farley Hackel, Deceased] | Hackel, Paige Farley | ECF No. 53 (15-cv-9903) at ¶3017; ECF No 432-2 (02-cv-1616 (D.D.C.)) |

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and based on the size of this MDL.

Dated: June 29, 2021

Respectfully submitted,

/s/ John M. Eubanks

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